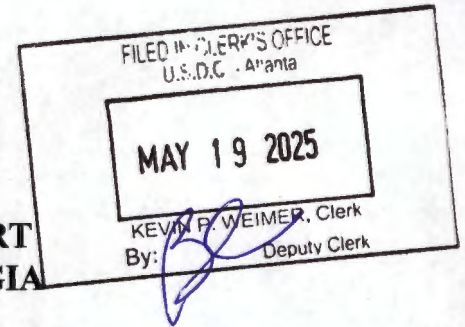


DOCUMENTS ASSOCIATED
WITH CIVIL CASES PENDING
IN THE
UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA



I. INITIAL DISCLOSURES

A. Plaintiff's Initial Disclosures.

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
Atlanta DIVISION

Mitchell Todman :

v. :

Signature Flight :
Support :

Civil Action No. 1:25-CV-02185-SDG-WEJ

PLAINTIFF'S INITIAL DISCLOSURES

(1) State precisely the classification of the cause of action being filed, a brief factual outline of the case including plaintiff's contentions as to what defendant did or failed to do, and a succinct statement of the legal issues in the case.

Employment Discrimination, ADA of 1990, 42 U.S.C. §§12101
Plaintiff, who is also a disabled veteran, submitted a reasonable accommodation
request under ADA to defendant who then terminated plaintiff's
employment. Defendant fabricated and made contradictory statements
in the termination letter. Defendant failed to engage^{in an interactive process with} Plaintiff to discuss

the reasonable accommodation request, directly contradicting defendant's own policy and ADA requirements.

(2) Describe in detail all statutes, codes, regulations, legal principles, standards and customs or usages, and illustrative case law which plaintiff contends are applicable to this action.

Americans with Disabilities Act: terminating an employee for requesting a reasonable accommodation is illegal. No Interactive Process occurred.

Pretext: Defendant made false statements in termination letter as reason for termination.

Defamation: Defendant made false statements to EEOC about plaintiff transferring bases.

(3) Provide the name and, if known, the address and telephone number of each individual likely to have discoverable information that you may use to support your claims or defenses, unless solely for impeachment, identifying the subjects of the information. (Attach witness list to Initial Disclosures as Attachment A.)

(4) Provide the name of any person who may be used at trial to present evidence under Rules 702, 703, or 705 of the Federal Rules of Evidence. For all experts described in Fed.R.Civ.P. 26(a)(2)(B), provide a separate written report satisfying the provisions of that rule. (Attach expert witness list and written reports to Responses to Initial Disclosures as Attachment B.)

(5) Provide a copy of, or a description by category and location of, all documents, data compilations or other electronically stored information, and tangible things in your possession, custody, or control that you may use to support your claims or defenses unless solely for impeachment, identifying the subjects of the information. (Attach document list and descriptions to Initial Disclosures as Attachment C.)

(6) In the space provided below, provide a computation of any category of damages claimed by you. In addition, include a copy of, or describe by category and location of, the documents or other evidentiary material, not privileged or protected from disclosure, on which such computation is based, including materials bearing on the nature and extent of injuries suffered, making such documents or evidentiary material available for inspection and copying

as under Fed.R.Civ.P. 34. (Attach any copies and descriptions to Initial Disclosures as Attachment D.)

Compensatory Damages = Last Wages April 2024 - August 2025 ^{or case resolution} = \$218,000.00

Punitive Damages = Annual Salary + bonus = \$157,500 x factor 4.41 = \$695,000.00

Non-Economic Damages Emotional Distress = \$157,500 x factor 4.41 = \$695,000.00

Total of \$1,608,000

(7) Attach for inspection and copying as under Fed.R.Civ.P. 34 any insurance agreement under which any person carrying on an insurance business may be liable to satisfy part or all of a judgment which may be entered in this action or to indemnify or reimburse for payments made to satisfy the judgment. (Attach copy of insurance agreement to Initial Disclosures as Attachment E.)

(8) Disclose the full name, address, and telephone number of all persons or legal entities who have a subrogation interest in the cause of action set forth in plaintiffs cause of action and state the basis and extent of such interest.
